

COHEN & GREEN

September 1, 2023

BY ECF

Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Cunningham v. City of New York, et al., 22-cv-00588 (LDH)(SJB)

Dear Judge Hall:

This firm along with co-counsel represents the Plaintiff. On August 24th, Defendants served a Rule 68 Offer of Judgment, attached as Exhibit 1. On September 1, 2023, Plaintiff accepted the Rule 68 by notifying defense counsel in writing as specified in the Rule 68. Early today, Plaintiff filed her acceptance on the docket in this case.

Plaintiff also respectfully requests that the Court issue an Order extending Plaintiff's counsels' time to make an application for attorney's fees from 14 days to 60 days after the Court enters judgment to allow the parties time to resolve the issue of fees without motion practice. Defendants consent to this request.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Jessica Massimi

Pronouns: She/Her

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiff

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cc:

All relevant parties by ECF.